4/1/2024

LAURA A. AUSTIN, CLERK
BY: s/ CARMEN AMOS
DEPUTY CLERK

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF VIRGINIA LYNCHBURG DIVISION

UNITED STATES OF AMERICA

.

: Case No. 6:23-CR-00008

ANDREW KENT a/k/a "Leo"

 V_{\bullet}

:

AGREED STATEMENT OF FACTS

This Statement of Facts briefly summarizes the facts and circumstances surrounding the criminal conduct at issue in this case. It does not contain all of the information obtained during the investigation and applicable to an accurate Presentence Investigation Report and Sentencing Guidelines Calculation. The Statement of Facts is not protected by proffer agreement or any other agreement and shall be wholly admissible at trial notwithstanding any rules or statutes to the contrary, including, but not limited to, Federal Rules of Evidence 408 and 410 and Federal Rule of Criminal Procedure 11.

In early January 2023, the defendant, ANDREW KENT, met a 14-year-old girl from Lynchburg, Virginia, (the "Victim") on Twitter. KENT initially pretended to be a 20-year-old woman named "Tris," and then KENT used the "Tris" persona to introduce the Victim to a young man named Leo. In reality, "Tris" and "Leo" were merely two different personas used by KENT. KENT, as Leo, told the Victim that he was from Roanoke, Virginia, and sent the Victim generic pictures of Roanoke in order to trick the Victim into believing that he was in fact from Roanoke and thus was in close geographic proximity to her.

On January 3, 2023, near the beginning of their communications, the Victim truthfully told KENT that she was 14. KENT truthfully told the Victim that he was 21. He also told the Victim that he would meet up with her after they first talked for a little bit. He told her that he wanted "to take a kid's virginity." As the conversation progressed, things took a sadomasochistic turn. KENT told the Victim that she needed to call him "daddy," "sir," or "master," and warned her that he might "punish" her if she failed to do so. KENT also used cruel and degrading language, telling the Victim that she looked "ready to be used" and that he wanted to do various things to the Victim, including urinate in her mouth, put her in a cage, and starve her until she was his "skinny little girl," only allowing her to consume his urine and semen. KENT called the Victim a "dumbass," a "stupid kid," "an idiot kiddo," and a "fucktoy." KENT told the Victim that he wanted to rape her, knock her out, and cut her open, and he and the Victim discussed how bruises would make her pretty.

KENT also told the Victim that he wanted to cut her and make her bleed, and he requested that she send him a photo of her topless and engaging in self-harm by cutting her thighs. The

Victim complied and sent KENT such a video, which included her carving "Leo" into her thigh. KENT asked for a photo so he could better see the "Leo" that the Victim had carved into her thigh. After the Victim sent such a photo, KENT told her that she needed to cut herself further so that the "Leo" would be more visible.

KENT also instructed the Victim to send him videos and photos of her naked breasts, vagina, and anus. Her told her to submit for a "hole inspection," whereby he would direct her to send pictures of her open mouth, her vagina, and her anus. The Victim obliged and sent KENT multiple photos of her exposed vagina and anus, as well as multiple photos and videos of her naked breasts.

On January 22, 2023, the Victim told KENT that she had "bipolar depression." KENT continued to ask the Victim to send him pornographic photos and videos, and the Victim obliged.

On January 28, 2023, KENT asked the Victim to send him a photo of her vagina and anus. The Victim complied. KENT then asked the Victim to post this photo on social media. The same day, KENT mentioned the idea of gathering his friends to have sex with the Victim and falsely telling them that the Victim was eighteen years old.

While KENT and the Victim exchanged the communications, photos, and videos described above, KENT was located in Kansas, and the Victim was located in Lynchburg, Virginia, in the Western District of Virginia. The communications, photos, and videos that KENT and the Victim exchanged were all transported in interstate commerce. KENT communicated with the Victim using a cell phone (a Samsung Galaxy S10, serial number RF8M41CF4ZT) and a computer (an Acer Aspire 5 laptop, serial number NXH8AAA0038490C7083400).

On June 16, 2023, KENT was arrested and consented to an interview with the Federal Bureau of Investigation. In the course of this interview, KENT told law enforcement that he habitually sought out minors online, primarily using Twitter. He mostly sought out 14- to 17-year-old girls, although some were as young as 12. KENT looked for minor girls who were willing to send pictures of things that he liked to see. He never forced girls to do anything that they did not want to do, but he would try to see how far they were willing to go.

KENT often used the "Tris" persona to meet minors online because he found that it was easier to get minor girls to talk to him if he pretended to be a young woman. He typically pretended to be a 20-year-old woman but sometimes pretended to be younger. Once KENT, using the "Tris" persona, located a minor girl with whom he wanted to continue communicating, KENT would change his social media location to wherever that girl was located so that it would appear that he was in the same geographic area. "Tris" would then introduce the girl to KENT, and he would move his conversations with these minor girls over to Snapchat and Discord.

KENT estimated that he solicited and received images of child pornography from approximately 200 minor girls. KENT would save these images for his personal collection but would go through periods where he would delete all of his pornographic images. As of the time of his June 2023 arrest, he had recently deleted his pornography cache but estimated that he had hundreds of child pornography images prior to doing so.

Seen and Agreed:

Date: March 26, 2024

Jugan M. Scheff

Assistant United States Attorney

I have reviewed the above Agreed Statement of Facts with my attorney, and I agree that it is true and accurate.

Date: March <u>13</u>, 2024

Andrew Kent

Carl Cornwell, Esq.
Attorney for Defendant

Jennifer S. DeGraw, Esq. Attorney for Defendant